

**NORTH CAROLINA
DIVISION OF AIR QUALITY**
Application Review

Region: Asheville Regional Office
County: Caldwell
NC Facility ID: 1400185
Inspector's Name: Patrick Ballard
Date of Last Inspection: 04/21/2020
Compliance Code: 3 / Compliance - inspection

Issue Date: xx

Facility Data Applicant (Facility's Name): Shurtape Technologies, Inc. - Plant No. 24 Facility Address: Shurtape Technologies, Inc. - Plant No. 24 220 Pleasant Hill Road Hudson, NC 28638 SIC: 2672 / Paper Coated And Laminated, Nec NAICS: 322222 / Coated and Laminated Paper Manufacturing Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V				Permit Applicability (this application only) SIP: 15A NCAC 02D .0503, .0516, .0521, and .1806 NSPS: 15A NCAC 02D .0524 (Subparts RR, Dc) NESHAP: 15A NCAC 02D .1111 (Subparts JJJJ, EEEE, DDDDD) PSD: N/A PSD Avoidance: N/A NC Toxics: N/A 112(r): N/A Other: N/A			
Contact Data				Application Data			
Facility Contact Mark Hawes Director of Environment and Safety (828) 322-2700 PO Box 1530 Hickory, NC 28603+1530	Authorized Contact David Neff Plant Manager (828) 267-8976 PO Box 1530 Hickory, NC 28603+1530	Technical Contact Mark Hawes Director of Environment and Safety (828) 322-2700 PO Box 1530 Hickory, NC 28603+1530	Application Number: 1400185.19A Date Received: 09/13/2019 Application Type: Renewal Application Schedule: TV-Renewal Existing Permit Data Existing Permit Number: 08486/T17 Existing Permit Issue Date: 11/30/2016 Existing Permit Expiration Date: 07/31/2020				
Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2018	0.0100	2.03	133.99	1.71	0.0100	123.84	123.76 [Toluene]
2017	0.0100	1.77	114.60	1.49	0.0100	104.33	104.21 [Toluene]
2016	0.0100	1.84	85.25	1.55	0.0100	77.09	77.08 [Toluene]
2015	0.0100	1.81	87.74	1.52	0.1400	76.88	76.88 [Toluene]
2014	0.0100	1.82	77.59	1.53	0.1400	67.35	67.35 [Toluene]
Review Engineer: Massoud M. Eslambolchi Review Engineer's Signature: _____ Date: _____				Comments / Recommendations: Issue 08486/T18 Permit Issue Date: xx Permit Expiration Date: xx			

1. Purpose of Application:

Shurtape Technologies, Inc. - Plant No. 24 [Shurtape] currently holds an Air Quality Permit 08486T17 which has an expiration date of July 19, 2020. Shurtape has submitted this application in order to renew the existing permit. Because of timely submittal of this renewal application (at least nine months before the expiration of the permit), the existing permit shall remain in effect, regardless of the expiration date, until this application is approved or denied.

2. Facility Description:

Shurtape produces "oriented polypropylene tape", also known as packing tape.

3. Permitting History/Background:

- August 10, 2015 Last Renewal Application approved (08486T16).
- November 30, 2016 Minor Modification Application approved (08486T17).

4. Application Chronology:

- September 19, 2019 Renewal Application .19A was received by ARO.
- April 21, 2020 Most recent Compliance Inspection by ARO.
- January 15, 2021 Draft Permit & Review sent to Applicant, ARO and SSCB
- February 5, 2021 Received comments from facility (addressed below)
- XX, XXXX The Public Notice / EPA Review periods begins.
- XX, XXXX The Public Notice period ends.
- XX, XXXX The EPA Review period ends.
- XX, XXXX Permit issued.

5. Permit Changes and TVEE Discussion:

With the application, Shurtape requested the following change to the permit:

- Combine the following insignificant sources 24-RB-1, 24-AO-1, 24-TH1 venting to a common stack.

Except the above, this Permit Renewal includes no modifications or additions to the permitted equipment list. No change to TVEE is deemed necessary.

6. Regulatory Applicability:

Shurtape (Plant No. 24) is subject to the following regulations, in addition to the requirements in the General Conditions:

- a. 15A NCAC 02D .0503 "Particulates from Fuel Burning Indirect Heat Exchangers"
- b. 15A NCAC 02D .0516 "Sulfur Dioxide from Combustion Sources"
- c. 15A NCAC 02D .0521 "Control of Visible Emissions"
- d. 15A NCAC 02D .0524 "New Source Performance Standards" NSPS
(40 CFR Part 60 Subparts Dc, RR)
- e. 15A NCAC 02D .1111 "Maximum Achievable Control Technology" (MACT)
(40 CFR Part 63 Subparts EEEE, JJJJ, DDDDD)
- f. 15A NCAC 02D .1806 "Control and Prohibition of Odorous Emissions" (State-enforceable only)

The facility's status with respect to the above applicable regulations has not changed. The permit will be updated to reflect the most current stipulations for all applicable regulations. For an in-depth discussion of MACT and NSPS requirements, see Section 7.

7. Federal Regulations (NSPS, MACT/GACT, PSD/NSR, 112(r), RACT, CAM):

a. NSPS

1. Subpart Dc

The facility operates a natural gas/propane fueled boiler (24-BLR) on site which is subject to NSPS Dc. This regulation only requires recordkeeping and reporting of fuel usage amounts regularly as prescribed.

Shurtape Plant No. 24 also operates a temporary natural gas/propane fueled boiler (24-BLR-Temp). According to 60.40c(i), temporary boilers are not subject to the NSPS Dc. Provided Shurtape continues to meet the definition of "temporary boiler", as defined by the NSPS, this boiler will have no requirements.

The requirements of this regulation as it applies to Shurtape have not changed. No changes are needed to the permit stipulation.

Based on the most recent inspection report, Shurtape appears to be in compliance with the regulation. Continued compliance with this regulation is expected.

2. Subpart RR

This regulation limits VOC emissions from the coating systems to 0.20 kg of VOC per kg of coating applied (on a monthly basis). In order to comply with the regulation, Shurtape uses carbon adsorption systems to control VOC emissions.

All monitoring, reporting, and recordkeeping requirements are satisfied by complying with MACT Subpart JJJJ.

The requirements of this regulation as it applies to Shurtape have not changed. No changes are needed to the permit stipulation.

Based on the most recent inspection report, Shurtape appears to be in compliance with the regulation. Continued compliance with this regulation is expected.

b. MACT/GACT

1. *Subpart EEEE*

This regulation covers organic liquid storage tanks (excluding gasoline). The regulation separates tanks into two categories: capacity greater or less than 5,000 gallons.

All of the subject tanks at Shurtape are less than 5,000 gallons in capacity. The only requirement for these tanks is that records be kept documenting the size and regulatory applicability of the tanks.

The requirements of this regulation as it applies to Shurtape have not changed. No changes are needed to the permit stipulation.

Based on the most recent inspection report, Shurtape appears to be in compliance with the regulation. Continued compliance with this regulation is expected.

2. *Subpart JJJJ*

This regulation limits HAP emissions from the subject coating lines and affiliated sources to less than 20% of the mass of coating solids applied (on a monthly basis). In order to comply with the regulation, Shurtape must operate its solvent adsorption-based control devices and use a continuous monitoring system to track quantity of the "volatile matter" captured by the control devices on monthly basis.

Compliance demonstration shall be made by maintaining records of coating usage and formulation contents and resultant total HAP emissions. The regulation provides equations to calculate the HAP emission rate from the records.

The most recent amendments to this regulation (effective 7/09/2020) requires subject sources to comply with the applicable emissions standards at all times during the operations including Startup, Shutdown or Malfunction (SSM) events. This change in the regulation (NESHAP Part 63, Subpart JJJJ), removes SSM provisions for existing source operations 365 days after effective date of the rule amendment. Existing source operations may continue to apply SSM provisions for compliance purposes until July 10, 2021.

Based on the most recent inspection report, Shurtape appears to be in compliance with the regulation. Continued compliance with this regulation is expected.

3. *Subpart DDDDD*

The only fuels used in boilers at the facility are natural gas and propane. Boilers (less than 100 MMBTU/hr max. gross heat input) subject to MACT DDDDD burning natural gas are required to maintain good work practice standards and keep records of maintenance. Note that included in the work practice standards is an annual tune-up of the subject boiler. The MACT provides guidelines for what constitutes a boiler tune-up. Records of maintenance must be reported regularly.

Shurtape also operates a temporary boiler (24-BLR-Temp) firing on natural gas/propane fuel. According to 63.7491(j), temporary boilers are not subject to the regulation provided they continue to meet the definition of temporary boiler, as defined in the regulation.

The requirements of this regulation as it applies to Shurtape have not changed. No changes are needed to the permit stipulation.

Based on the most recent inspection report, Shurtape appears to be in compliance with the regulation. Continued compliance with this regulation is expected.

c. PSD/NSR

The Prevention of Significant Deterioration (PSD) regulations define a major stationary source as being one which emits or has the potential to emit 250 tons per year of any regulated pollutant, unless it is one of the listed sources for which the PSD major source threshold is 100 tons per year. Shurtape Plant No.24 is not one of the listed sources for which the PSD applicability threshold is 100 tpy. The potential emissions of each PSD regulated pollutant from the Shurtape Plant No.24 facility are less than 250 tons per year, therefore Shurtape Plant No.24 is not considered a major source under the PSD regulations, and remains as a minor PSD facility.

d. 112(r)

Shurtape Plant 24 appears to not store any 112(r)-subject materials in quantities above their respective thresholds. Therefore, Section 112(r) of the Clean Air Act does not apply.

e. RACT

The facility is not located in an area of ozone nonattainment or maintenance. Therefore, RACT does not apply.

f. CAM

The facility is exempt from CAM regulations (determined during the last renewal review and approval).

8. Toxic Air Pollutants

Shurtape Plant No.24 is not subject to 15A NCAC 02D .1100.

According to North Carolina Session Law 2012-91, sources subject to rules in 40 CFR Part 63 (i.e. MACT requirements) are no longer subject to TAP emission requirements, provided that the emission sources do not present an unacceptable risk to human health.

In reviewing of this Renewal Application, and consistent with the most recent Minor Modification Application, and the last Renewal Application, it is determined that the MACT applicable source operations do not present an unacceptable risk to human health. The last Renewal approval determined that the MACT subject sources did not present an unacceptable risk to human health based on the modeled emission limits in the permit. The modeled emissions were based on worst case emission rates and greater than the facility's actual emissions rates under the initial TV approval. This Renewal Application proposes no increase in emission rates from the subject sources which could result in increases to the facility's modeled emission limits. Therefore, it is anticipated that the subject source operations do not pose an unacceptable risk to human health.

9. Facility Emissions Review

The changes made as part of this permit application are not expected to exceed the facility's emission profile. The table on page 1 contains the historical emissions data for this facility.

10. Compliance Status

1. Notices of Violation/Recommendation for Enforcement since the previous renewal

None.

2. Inspection status

The facility was most recently inspected by Patrick Ballard on April 21, 2020, and Shurtape Plant 24 appeared to be in compliance with the permit at the time of the inspection.

11. Other Regulatory Concerns

A PE seal was not required for this permit renewal.

A zoning consistency determination was not required for this permit renewal.

12. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 02Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 02Q .0522, a copy of each permit application, each proposed permit and each final permit shall be provided to EPA. Also pursuant to 02Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 15A NCAC 02Q .0521 above.

The Public Notice and EPA Review periods began on XXXXXX, XXXX. The Notice period ended on XXXXX, XXX.

13. Comments on Draft Permit

The following are comments and responses received from the facility:

- Facility raised concern for a possible need to operate the Temporary Boiler (24-BLR-Temp) in the event the main boiler (24-BLR-2) is off duty and as a result the Temporary Boiler operation may exceed the regulatory time limits of NSPS and MACT DDDDD (at which time no longer can qualify for the avoidance provisions in Section 2.1.D.6).

Response: The Draft was revised to clarify that the source shall be subject to the requirements of NSPS and MACT in the event it longer qualifies as a Temporary Boiler as defined by the applicable regulations.

- The Permittee commented on the 2 existing Corona Treater Units and clarification on the applicable regulations and compliance, as these sources are only subject to the Facility-Wide requirements (Control & Prohibition of Odor Emissions), as previously permitted.

Response: The revised Draft makes reference (clarification) in Section 2.1.F for these sources 24-CT-1 and 24-CT-2 being subject to Facility-Wide requirements only.

14. Stipulation Review

The following Table 13-1 lists the changes to the Shurtape Technologies, Inc. – Plant No. 24 air quality permit 08486T17:

Change List

Section	Description
Throughout	<ul style="list-style-type: none"> Updated revision number Updated issue dates Updated permit with new logo and letterhead
Insignificant Activities	<ul style="list-style-type: none"> Updated formatting to match the permit shells Combined two raw materials hoppers (I-24-RB-1 and I-24-AO-1) with extruder hopper (I-24-TH-1) venting to bagfilter
Emission Source List	<ul style="list-style-type: none"> Updated/clarified regulation callouts Numbered out emission sources previously listed with "through" Removed the footnote for ES-24-CT-1, which previously stated "no applicable regulations". Added Section 2.1.F. for the two existing Corona Treater units 24-CT-1 and 24-CT-2, to include Facility-Wide requirement (only applicable regulation)
Section 2.1.A.3	<ul style="list-style-type: none"> Updated MACT JJJJ (Amended) requirements for Sources (ID Nos. 24-CL1-1, 24-CL1-2, and 24-CL1-3) - Section 2.1.A.3.c (i, ii)
Section 2.1.D	<ul style="list-style-type: none"> Updated MACT DDDDD requirements for two boilers (24-BLR-2 and 24-BLR-Temp) - Sections 2.1.D.5 and 2.1.D.6
Section 3	<ul style="list-style-type: none"> Updated General Conditions with Version 5.5 (08/25/2020)

15. Recommendations

This engineer recommends renewal of the existing Title V permit through issuance of the air quality permit 08486T18, upon the completion of both public comment (30 days) and EPA review (45 days) periods.